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MMCA Group, Ltd.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

14 MMCA GROUP, LTD., a Virginia  
15 corporation,  
16 Plaintiff  
17 v.  
18 HEWLETT-PACKARD COMPANY, a  
19 Delaware corporation, PICA, an Ohio  
corporation,  
20 Defendants.  
21  
22  
23 Civil Action No. CV 06-07067-MMC (EMC)  
**ORDER GRANTING**  
**ADMINISTRATIVE MOTION TO FILE**  
**UNDER SEAL EXHIBITS TO**  
**DECLARATIO OF FREDERICK**  
**GEONETTA IN SUPPORT OF OBJECTION**  
**TO ANY EVIDENCE RENDERED BY**  
**MIKHAIL REIDER-GORDON RE**  
**DEFENDANTS' MOTIONS FOR**  
**SUMMARY JUDGMNET JUDGMENT**  
  
Date: November 20, 2009  
Time: 9:00 a.m.  
Place: Courtroom 7, 19<sup>th</sup> Floor  
Judge: Hon. Maxine M. Chesney

Pursuant to Federal Rule of Civil Procedure 16(c), Civil Local Rules 7-11 and 79-5, and the Stipulated Protective Order (“Protective Order”) on file as Docket No. 241, Plaintiff MMCA Corporation (“MMCA”) hereby requests permission to file under seal the following documents that have previously been designated either Confidential or AEO by one or more of the parties, or

1 that refer to documents or material that is Confidential or has been designated Confidential by one  
2 of the parties to this case:

3 A. Exhibits A and B to the Declaration of Frederick Geonetta in Support of Objection  
4 to any Evidence Rendered by Mikhail Reider-Gordon RE Defendants' Motions for  
Summary Judgment or Alternatively Motion for Judgment on the Pleadings

5 MMCA seeks to file each of the above-referenced documents under seal because they are  
6 or contain references to documents that have been designated by one of the parties to this lawsuit  
7 as either "Confidential" or "Highly Confidential Attorneys' Eyes Only" pursuant to the procedures  
8 set forth in the Protective Order, Document No. 241.

9 Civil Local Rule 79-5 provides where a party seeks to submit to the Court a document that  
10 has been designated by another party as Confidential pursuant to a protective order, that party  
11 must file an Administrative Motion for a sealing order. Thereafter, within five days, designating  
12 party must then file with the Court and serve a declaration establishing that the designated  
13 documents are sealable, and must lodge and serve a narrowly tailored proposed sealing order  
14 within five days of submission. Civ. L.R. 79-5(d).

15 Based on the foregoing, Plaintiff MMCA respectfully asks that the Court enter an order  
16 permitting MMCA to file the referenced documents under seal.

17 Dated: November 13, 2009

18 By: /s/ Kenneth Frucht  
19 Kenneth Frucht  
20 Attorney for Plaintiff MMCA

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25 Dated: January 5, 2010  
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